I, Juan Proaño, pursuant to 28 U.S.C. § 1746, declare that the following statements are true and correct to the best of my knowledge and belief:

- 1. I am the Chief Executive Officer of League of United Latin American Citizens (LULAC), a position I have held since November 2023. In my role as Chief Executive Officer, I oversee the day-to-day operations at LULAC and work to amplify the organization's advocacy initiatives and action-oriented programs.
- 2. LULAC is a nationwide, non-profit, non-partisan, membership-based organization with 535 councils (local chapters) and over 325,000 members. LULAC was established in 1929 and has its headquarters in Washington, D.C.

LULAC's mission and activities

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- 3. LULAC is the largest and oldest Latino civil rights organization in the United States. LULAC's mission is to improve the lives of Latino families throughout the United States and to protect their civil rights in all aspects.
- 4. LULAC advances the economic condition, educational attainment, political influence, housing, health, and civil rights of Hispanic Americans through community-based programs operating at more than 525 LULAC councils nationwide.
- 5. LULAC has a national board, president, and professional staff, as well as several issue-specific committees.
- 6. LULAC provides citizenship application assistance and civics and citizenship education to its members, many of whom are immigrants.
- 7. LULAC and its affiliates provide approximately one million dollars in scholarships to Hispanic students each year. LULAC Institute programs include citizenship and

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voter registration drives as well as education and health events and programs that empower the Hispanic community at the local, state and national level.

8. In addition, LULAC offers educational programming to disadvantaged youth which impacts more than 18,000 Hispanic students per year at fourteen regional centers. LULAC affiliates, including LULAC's employment arm, provide job skills and literacy training to the Hispanic community through more than forty-eight employment training centers located throughout the United States. The LULAC Corporate Alliance, an advisory board of Fortune 500 companies, fosters stronger partnerships between Corporate America and the Hispanic community.

LULAC's membership

- 9. LULAC's members include U.S. citizens, lawful permanent residents, student visa holders, asylees, refugees, parolees, noncitizens with Temporary Protected Status ("TPS"), Deferred Action for Childhood Arrivals ("DACA") recipients, applicants for immigration relief including asylum, and undocumented noncitizens.
- 10. Our membership changes on a weekly basis, as new members join and, sometimes, existing members leave. Maintaining and updating our membership lists is an ongoing, resource-intensive process. Given our limited capacity, it sometimes takes up to a week before a new member is reflected in our systems. We also have no existing process to confirm a person's current membership in LULAC for outside entities, and setting up and deploying that kind of system would seriously strain LULAC's resources.

President Trump's executive order affects LULAC members

11. President Trump's Executive Order restricting birthright citizenship ("the Executive Order," or "the Order") will have a profound impact on LULAC's members and the

Latino community. LULAC has identified various members who are currently expecting children who (when born) will be covered by the Order.

- 12. For some of these members, both parents of the expected baby are LULAC members. For some, only one parent is a member. Some parents live together while others do not—including in some cases parents that live in different States.
- 13. "Carmen" is a LULAC member who is currently pregnant. She currently resides in Maryland and has lived in the United States for over 15 years. Carmen has a pending application for a U visa, which provides a path to permanent immigration status to victims of certain crimes, but has no other immigration status. The father of her expected child also has no immigration status.
 - 14. Under the Order, Carmen's child risks being deemed to not be a U.S. citizen.
- 15. Carmen fears that, because of the Order, her child could be targeted by immigration enforcement and deported, separating the child from family in the United States.
- 16. Carmen intends to apply for a passport for her child, when born, but under the Order the child risks being deemed ineligible for a passport.
- 17. Because of the Order, Carmen's baby risks denial of access to healthcare and nutrition.
- 18. Carmen's baby would qualify for the Supplemental Nutrition Assistance Program ("SNAP"). However, because of the Order, the baby risks being deemed ineligible.
- 19. Likewise, the baby would qualify for health insurance under Medicaid, but risks being denied critical early life medical care because of the Order.
 - 20. I hereby declare under penalty of perjury that the foregoing is true and correct.

¹ To protect this member's privacy and security, I am using a fictitious name to describe her.

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Executed on this 21st day of January 2025.

Juan Proaño